

July 1, 2019

VIA ECF

The Honorable Valerie Caproni
United States District Judge
Southern District of New York
40 Foley Square, Room 240
New York, New York 10007

Re: Bloomberg Finance L.P. v. UBS AG, No. 1:18-cv-06334 (VEC)—Joint Status Letter

Dear Judge Caproni:

This letter is submitted jointly by Plaintiff Bloomberg Finance L.P. (“Bloomberg”) and Defendant UBS AG (“UBS” and together with Bloomberg, the “Parties”) pursuant to Section I.A.3 of the Amended Scheduling Order and Discovery Plan, entered April 2, 2019 [Dkt. 65], and Your Honor’s instruction during the Parties’ August 17, 2018 initial pre-trial conference.

Exchange of Customer Lists. As noted in the Parties’ June 3, 2019 Status Letter [Dkt. 70], UBS has produced a list of certain UBS Delta customers pursuant to the Stipulation and Order Governing the Exchange of Certain Highly Confidential Material, which was entered on April 12, 2019 [Dkt. 67] (the “Customer List Stipulation”). On May 15, 2019, Bloomberg produced an interim list of UBS Delta Customers (or their potential affiliates) that had an agreement with Bloomberg pursuant to the parameters outlined in Paragraph 2 of the Customer List Stipulation. Bloomberg produced a completed list of such entities on June 7, 2019, and is working diligently to compile and produce the remaining information described in Paragraph 3 of the Customer List Stipulation as soon as reasonably practicable.

Document Discovery. Bloomberg made a supplemental production of documents, as referenced in the June Status Letter, on June 14, 2019. Both parties have recently exchanged correspondence regarding certain outstanding categories of document discovery and will continue to meet and confer.

Depositions. The Parties have begun to schedule and take depositions.

Third Party Discovery. The Parties are continuing to meet and confer with third parties that are the subject of discovery requests regarding the third parties’ production of documents.

Respectfully submitted,

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